

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Shenzhen Dejiayun Network
Technology Co., Ltd., a Chinese
Corporation

Plaintiff,

V.

The Partnerships And Unincorporated Associations Identified On Schedule “A”

Defendants.

Case No. 21-cv-6607

Judge Manish S. Shah

Magistrate Jeffrey I. Cummings

Exhibit One

Grande Vente**Response to Plaintiff's Interrogatories #1 vs Amended Response to Plaintiff's Interrogatories #1 vs 2nd Amended Response to Plaintiff's Interrogatories #1**

Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of:

- a. Each Defendant Internet Store;
- b. Defendants' Financial Accounts;
- c. Defendants' Paypal Payment Account Name;
- d. Defendants' email addresses

Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of: a. Each Defendant Internet Store; b. Defendants' Financial Accounts; c. Defendants' Paypal Payment Account Name; d. Defendants' email addresses

Answer. Fengnuan Wang, Horizon String Inc, golden045@163.com (Payoneer), kindright@outlook.com.

Answer.
Fengnuan Wang, Horizon String Inc,
golden045@163.com (Payoneer),
kindright@outlook.com.

See Doc. 80 at ¶10; 80-7 at 3

Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of: a. Each Defendant Internet Store; b. Defendants' Financial Accounts; c. Defendants' Paypal Payment Account Name; d. Defendants' email addresses

Answer.

- a. Grande vente, Fengnuan Wang, manager of Grande Vente, 18772805376, who has information related to the operation of the storefront, including its sales, and who may be reached at 3650 S Irving St, Sheridan CO 80110.
- b. golden045@163.com (Payoneer). See Response to Interrogatory 3.
- c. No Paypal Account
- d. kindright@outlook.com.

Answer.
a. Grande vente, Fengnuan Wang, manager of Grande Vente, 18772805376, who has information related to the operation of the storefront, including its sales, and who may be reached at 3650 S Irving St, Sheridan CO 80110.
b. golden045@163.com (Payoneer). See Response to Interrogatory 3.
c. No Paypal Account
d. kindright@outlook.com.

See Doc. 80 at ¶11; 80-8 at 3

Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of: a. Each Defendant Internet Store; b. Defendants' Financial Accounts; c. Defendants' Paypal Payment Account Name; d. Defendants' email addresses

Answer.

- a. Grande vente, Fengnuan Wang, manager of Grande Vente, 18772805376, who has information related to the operation of the storefront, including its sales, and who may be reached at 3650 S Irving St, Sheridan CO 80110.
- b. golden045@163.com (Payoneer). See Response to Interrogatory 3.
- c. No Paypal Account
- d. kindright@outlook.com.

Answer.
No change

See Doc. 80 at ¶12; 80-8 at 2

YUCVELP Outlets'**Response to Plaintiff's Interrogatories #1 vs Amended Response to Plaintiff's Interrogatories #1 vs 2nd Amended Response to Plaintiff's Interrogatories #1**

Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of:

- a. Each Defendant Internet Store;
- b. Defendants' Financial Accounts;
- c. Defendants' Paypal Payment Account Name;
- d. Defendants' email addresses

Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of: a. Each Defendant Internet Store; b. Defendants' Financial Accounts; c. Defendants' Paypal Payment Account Name; d. Defendants' email addresses

Answer. Liuru Chen, Shenzhen Qiyu Electronic Commerce Co. LTD
piesoacet996@163.com (Payoneer), joashargey24@gmail.com.

Answer.

Liuru Chen, Shenzhen Qiyu Electronic Commerce Co. LTD piesoacet996@163.com (Payoneer), joashargey24@gmail.com.

See Doc. 80 at ¶18; 80-15 at 3

Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of: a. Each Defendant Internet Store; b. Defendants' Financial Accounts; c. Defendants' Paypal Payment Account Name; d. Defendants' email addresses

Answer.

- a. Liuru Chen, Shenzhen Qiyu Electronic Commerce Co. LTD manager of YUCVELP Outlets, 13612983059, who has information related to the operation of the storefront, including its sales, and who may be reached at Room 412, 4th Floor, Jiangzhou Building, No.108 luofang Road, Huangbei Street, Luohu District, Shenzhen, China.
- b. piesoacet996@163.com (Payoneer)
- c. No Paypal Account

Page 2 of 7

d. joashargey24@gmail.com.

Answer.

a. Liuru Chen, Shenzhen Qiyu Electronic Commerce Co. LTD manager of YUCVELP Outlets, 13612983059, who has information related to the operation of the storefront, including its sales, and who may be reached at

Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of: a. Each Defendant Internet Store; b. Defendants' Financial Accounts; c. Defendants' Paypal Payment Account Name; d. Defendants' email addresses

Answer.

- a. Liuru Chen, Shenzhen Qiyu Electronic Commerce Co. LTD manager of YUCVELP Outlets, 13612983059, who has information related to the operation of the storefront, including its sales, and who may be reached at Room 412, 4th Floor, Jiangzhou Building, No.108 luofang Road, Huangbei Street, Luohu District, Shenzhen, China.
- b. piesoacet996@163.com (Payoneer)
- c. No Paypal Account

Page 2 of 7

d. joashargey24@gmail.com.

No change

See Doc. 80 at ¶20; 80-17 at 2

| | | |
|---|--|---|
| | Room 412, 4th Floor, Jiangzhou Building, No.108 luofang Road, Huangbei Street, Luohu District, Shenzhen, China. b. piesoacet996@163.com (Payoneer) c. No Paypal Account d. joashargey24@gmail.com. See Doc. 80 at ¶19; 80-16 at 3 | |
| <u>MCKESONYRAS</u> <u>Response to Plaintiff's Interrogatories #1 vs Amended Response to Plaintiff's Interrogatories #1 vs 2nd Amended Response to Plaintiff's Interrogatories #1</u> | | |
| Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of: a. Each Defendant Internet Store; b. Defendants' Financial Accounts; c. Defendants' Paypal Payment Account Name; d. Defendants' email addresses | | |
| <p>Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of: a. Each Defendant Internet Store; b. Defendants' Financial Accounts; c. Defendants' Paypal Payment Account Name; d. Defendants' email addresses</p> <p>Answer. Suyou Long, International Group Inc, everlove@163.com (Payoneer), Abigaillight@hotmail.com.</p> <p>Answer.</p> <p>Suyou Long, International Group Inc, everlove@163.com (Payoneer), Abigaillight@hotmail.com.</p> <p>See Doc. 80 at ¶26; 80-23 at 3</p> | <p>Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of: a. Each Defendant Internet Store; b. Defendants' Financial Accounts; c. Defendants' Paypal Payment Account Name; d. Defendants' email addresses</p> <p>Answer.</p> <p>a. Suyou Long, manager of MCKESONYRAS / T-USA, 18773787287, who has information related to the operation of the storefront, including its sales and who may be reached via information on D000034-000035.</p> <p>b. everlove@163.com (Payoneer). See Response to Interrogatory 3.</p> <p>c. No Paypal Account</p> <p>d. Abigaillight@hotmail.com.</p> <p>Answer.</p> <p>a.Suyou Long, manager of MCKESONYRAS/T-USA, 18773787287, who has information related to the operation of the storefront, including its sales and who may be</p> | <p>Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of: a. Each Defendant Internet Store; b. Defendants' Financial Accounts; c. Defendants' Paypal Payment Account Name; d. Defendants' email addresses</p> <p>Answer.</p> <p>a. Suyou Long, manager of MCKESONYRAS / T-USA, 18773787287, who has information related to the operation of the storefront, including its sales and who may be reached via information on D000034-000035.</p> <p>b. everlove@163.com (Payoneer). See Response to Interrogatory 3.</p> <p>c. No Paypal Account</p> <p>d. Abigaillight@hotmail.com.</p> <p>Answer.</p> <p>No changes</p> <p>See Doc. 80 at ¶28; 80-25 at 2</p> |

| | | |
|---|---|---|
| | <p>reached via information on D000034-000035. b. everlove@163.com (Payoneer). See Response to Interrogatory 3. c. No Paypal Account d. Abigaillight@hotmail.com.</p> <p>See Doc. 80 at ¶27; 80-24 at 3</p> | |
| <p>LAMODE</p> <p><u>Response to Plaintiff's Interrogatories #1 vs Amended Response to Plaintiff's Interrogatories #1 vs 2nd Amended Response to Plaintiff's Interrogatories #1</u></p> | | |
| <p>Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of:</p> <p>a. Each Defendant Internet Store; b. Defendants' Financial Accounts; c. Defendants' Paypal Payment Account Name; d. Defendants' email addresses</p> | | |
| <p>Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of: a. Each Defendant Internet Store; b. Defendants' Financial Accounts; c. Defendants' Paypal Payment Account Name; d. Defendants' email addresses</p> <p>Answer. Siyao Li, Shenzhen xinjiduo electronic Commerce Co. LTD, yodadwttec555@163.com (Payoneer), mawdsleykuzemka00@gmail.com.</p> <p>Answer. Siyao Li, Shenzhen xinjiduo electronic Commerce Co. LTD, yodadwttec555@163.com (Payoneer), mawdsleykuzemka00@gmail.com.</p> <p>See Doc. 80 at ¶38; 80-35 at 3</p> | <p>Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of: a. Each Defendant Internet Store; b. Defendants' Financial Accounts; c. Defendants' Paypal Payment Account Name; d. Defendants' email addresses</p> <p>Answer.</p> <p>a. Siyao Li, Shenzhen xinjiduo electronic Commerce Co. LTD manager of LAMODE, 18126434554, who has information related to the operation of the storefront, including its sales, and who may be reached 407 jixun Building, No.3 Huanggang Park Street, Huanggang Community, Futian Street, Futian District, Shenzhen, China.</p> <p>b. yodadwttec555@163.com (Payoneer)</p> <p>c. No Paypal Account</p> <p>d. mawdsleykuzemka00@gmail.com.</p> <p>Page 2 of 7</p> <p>Answer.</p> | <p>Interrogatory 1. Identify Yourself, including, but not limited to, stating the following for each Defendant and Defendant Internet Store and identifying the owner(s) and/or operator(s) of: a. Each Defendant Internet Store; b. Defendants' Financial Accounts; c. Defendants' Paypal Payment Account Name; d. Defendants' email addresses</p> <p>Answer.</p> <p>a. Siyao Li, Shenzhen xinjiduo electronic Commerce Co. LTD manager of LAMODE, 18126434554, who has information related to the operation of the storefront, including its sales, and who may be reached 407 jixun Building, No.3 Huanggang Park Street, Huanggang Community, Futian Street, Futian District, Shenzhen, China.</p> <p>b. yodadwttec555@163.com (Payoneer)</p> <p>c. No Paypal Account</p> <p>d. mawdsleykuzemka00@gmail.com.</p> <p>Page 2 of 7</p> <p>Answer.</p> |

| | | |
|--|---|---|
| | <p>a. Siyao Li, Shenzhen xinjiduo electronic Commerce Co. LTD manager of LAMODE, 18126434554, who has information related to the operation of the storefront, including its sales, and who may be reached 407 jiexun Building, No.3 Huanggang Park Street, Huanggang Community, Futian Street, Futian District, Shenzhen, China.</p> <p>b. yodadwtec555@163.com (Payoneer)</p> <p>c. No Paypal Account</p> <p>d. mawdsleykuzemka00@gmail.com.</p> <p>See Doc. 80 at ¶39; 80-36 at 3</p> | <p>No changes</p> <p>See Doc. 80 at ¶40; 80-37 at 2</p> |
|--|---|---|